

# **EXHIBIT F**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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LULA WILLIAMS, GLORIA TURNAGE,  
GEORGE HENGLE, and DOWIN COFFY,  
Plaintiffs,

v.

MICROBILT CORPORATION, et al.,  
Defendants.

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Docket No.3:19-cv-00085-REP

**MICROBILT CORPORATION’S OBJECTIONS AND ANSWERS  
TO PLAINTIFF’S INTERROGATORIES**

MicroBilt Corporation (“MicroBilt”) hereby responds to Plaintiff’s Interrogatories:

**GENERAL OBJECTIONS**

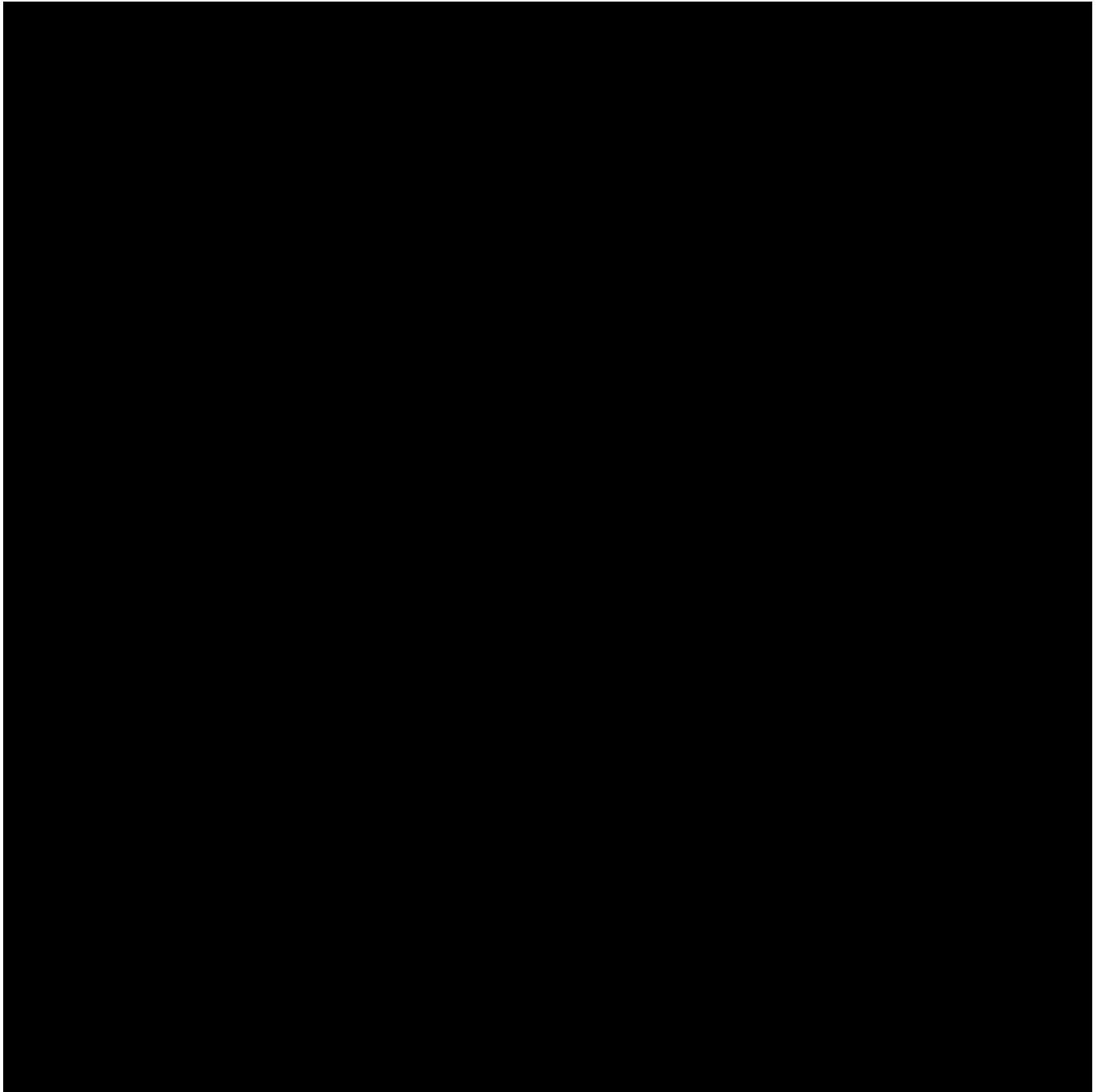
1. MicroBilt objects to Plaintiff’s Written Discovery on the grounds that her claims under the Fair Credit Reporting Act, 15 U.S.C. §1681, *et seq.* (the “FCRA”) are barred to the extent that the information allegedly conveyed was not FCRA governed.

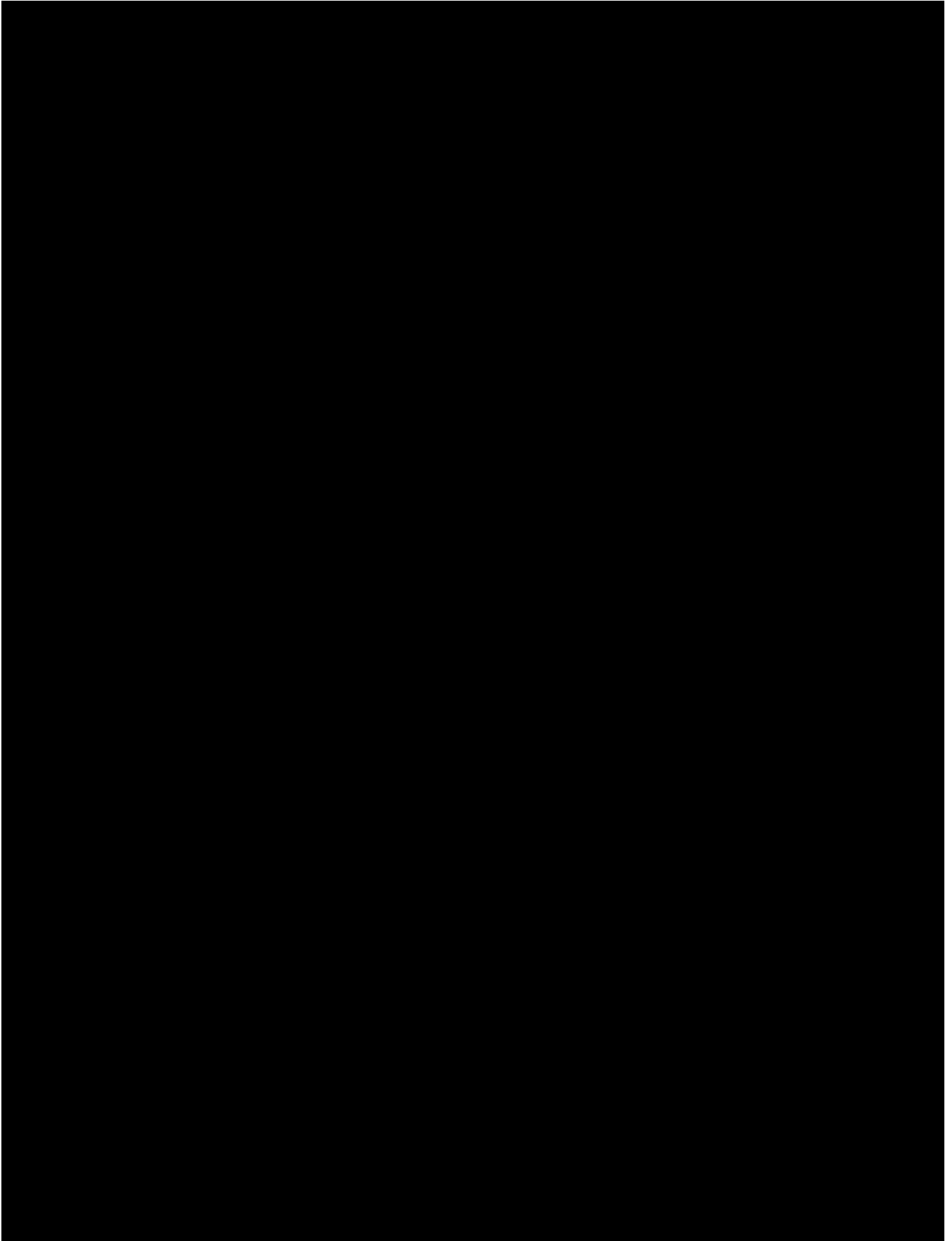
2. MicroBilt objects to Plaintiff’s Written Discovery to the extent that they seek to impose duties or obligations beyond those required by the Federal Rules of Civil Procedure.

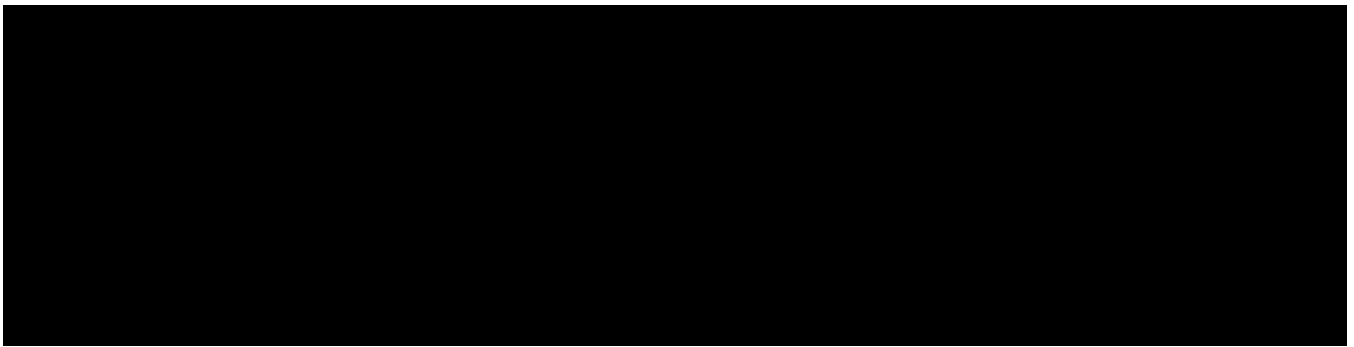
3. MicroBilt objects to Plaintiff’s Written Discovery to the extent that they seek documents or information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or otherwise seek documents or information prepared in anticipation of litigation or for trial or which constitute or disclose the mental impressions, conclusions, opinions or legal theories of attorneys or other representatives of MicroBilt concerning this or any other litigation.

4. MicroBilt incorporates these General Objections into each specific response below as if set forth more fully.

**INTERROGATORIES**



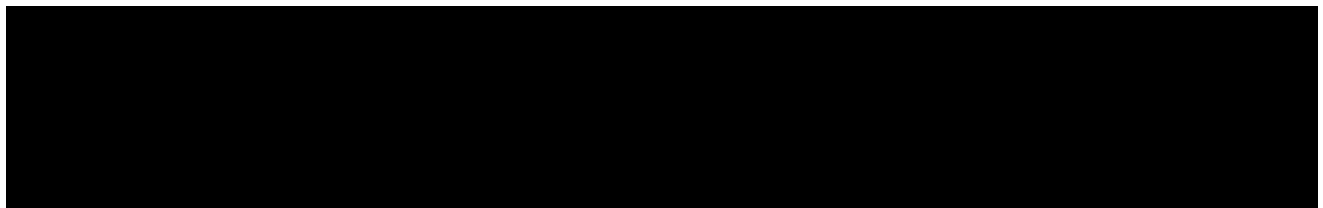


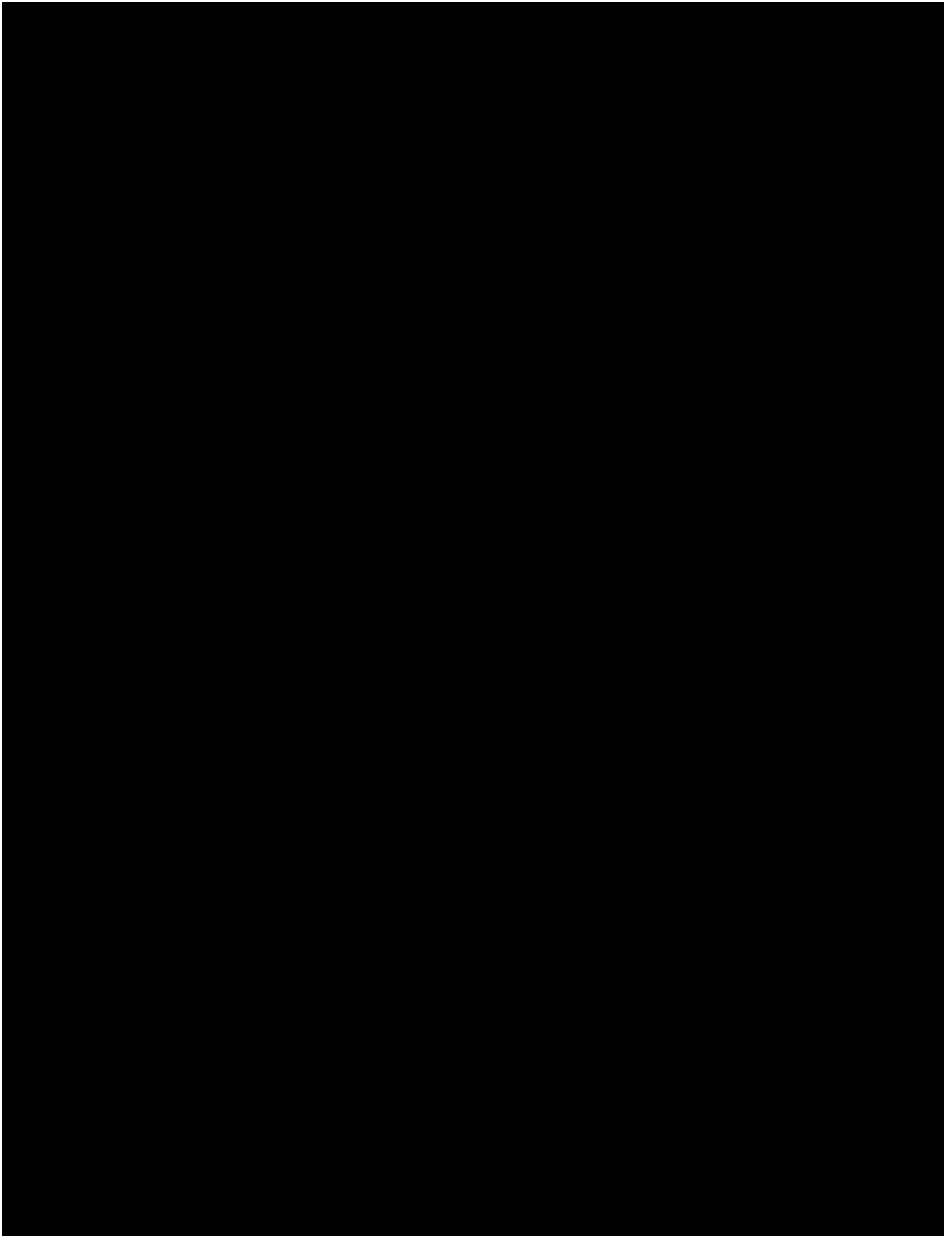


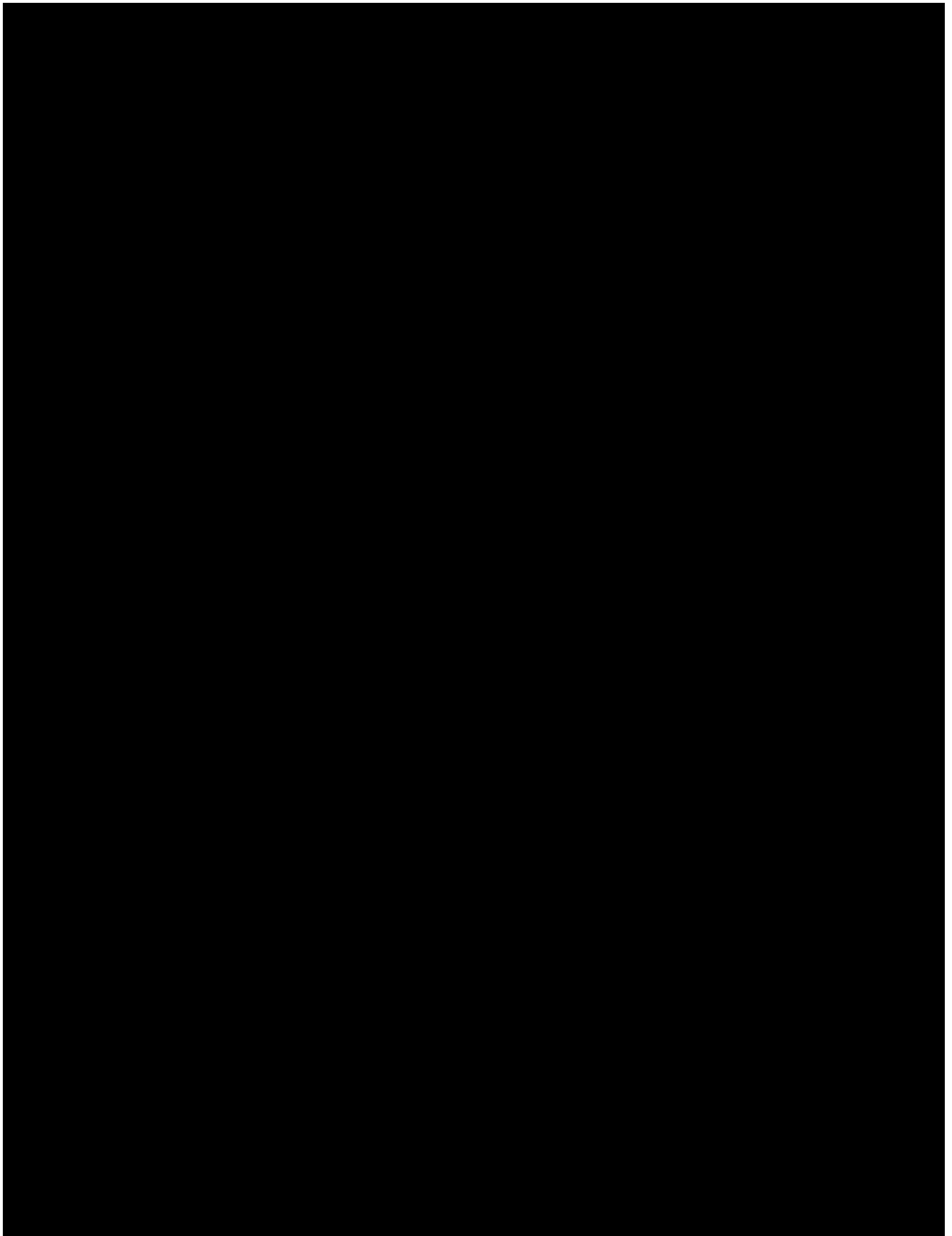
7. State the factual basis of any and all affirmative defenses that you have asserted to the Plaintiffs' Complaint.

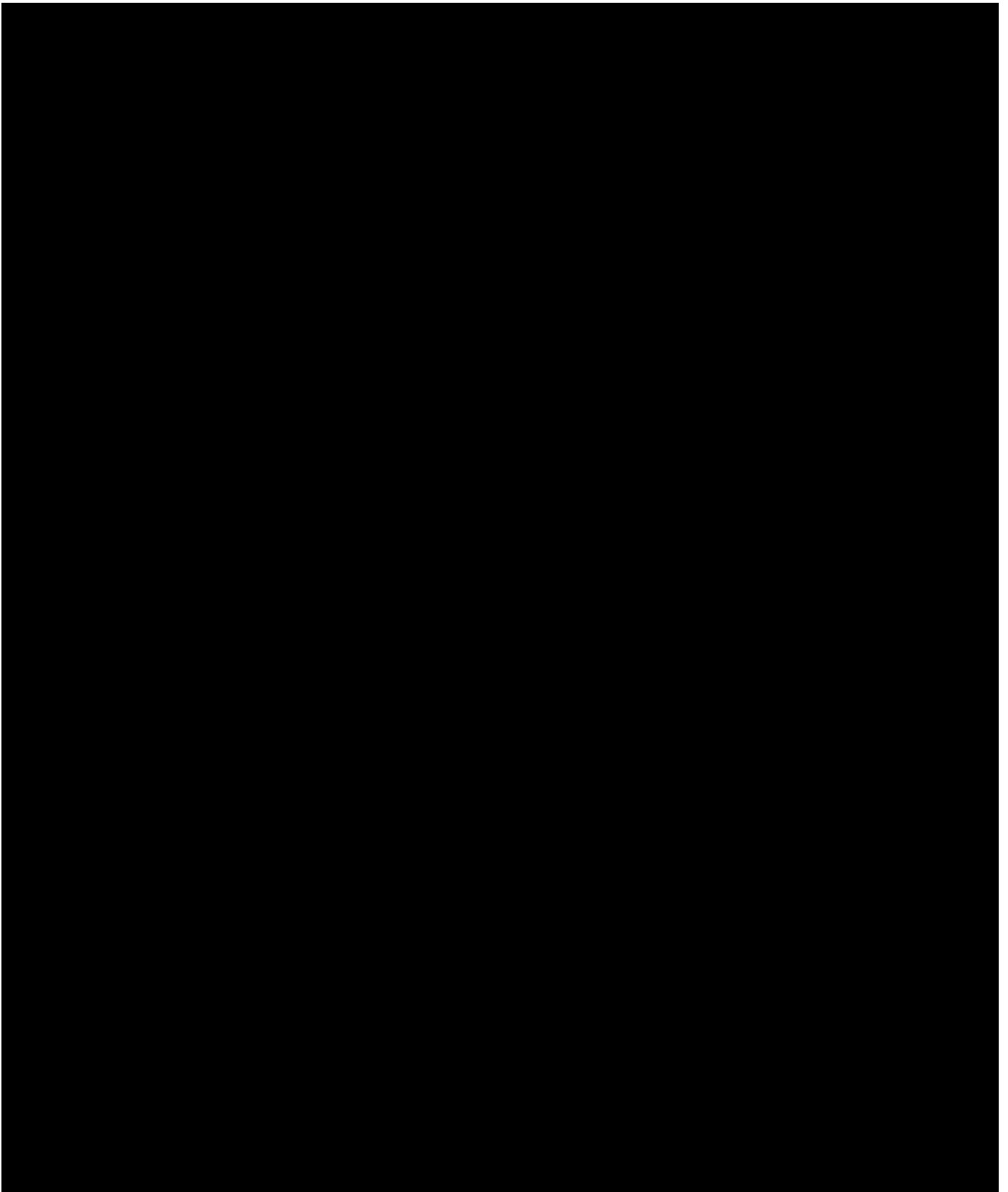
**ANSWER:**

- 1) This judicial district is not the proper venue or forum for this litigation, because Plaintiffs have filed an action against Philip Burgess in New Jersey alleging effectively the exact same facts and allegations as in this action, and this action should be transferred to New Jersey federal court for disposition together for judicial economy purposes, to avoid the high risk of potential inconsistent results, and to avoid the unnecessary expense and unfair prejudice to Burgess and MicroBilt and unfair advantage to Plaintiffs of proceeding in this action any further after waiting over seven (7) months to refile their action against Burgess;
- 2) The information which is the subject of the action was data which is not governed by the FCRA and therefore Plaintiffs fail to state a claim;
- 3) There was no FCRA obligation to disclose any inquiry in connection with the data because it was not FCRA governed and not furnished under circumstances which implicated the FCRA and therefore Plaintiffs fail to state a claim;
- 4) Plaintiffs cannot establish a willful violation of the FCRA because the data furnished was not FCRA governed or reasonably believed or known to be FCRA governed and therefore MicroBilt's compliant FCRA procedures were not implicated; and
- 5) MicroBilt did not act in a manner with reckless disregard of Plaintiffs' FCRA rights and its reading of the statute was not objectively unreasonable and did not represent an unjustifiably high risk of violating the FCRA or causing Plaintiffs any harm.

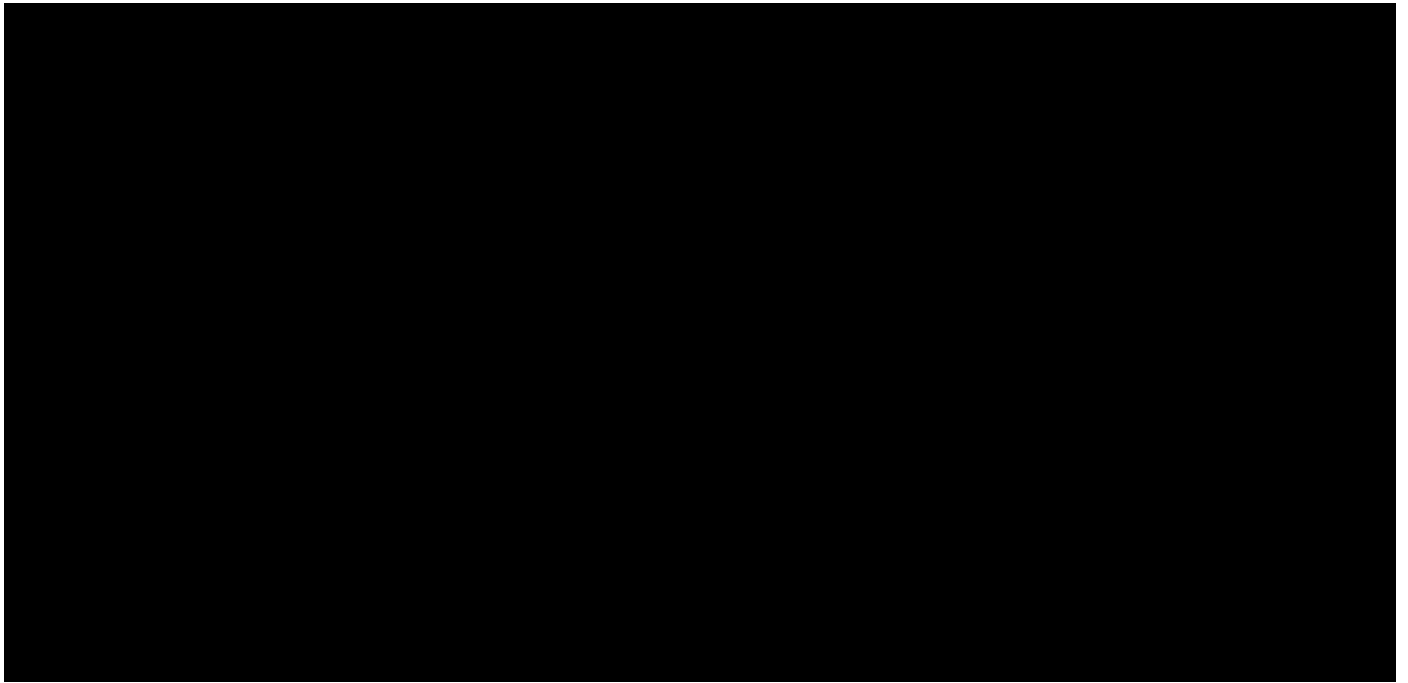












**AFFIRMATION**

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.**

Signed: Walter Wojciechowski, CEO

Printed Name: WALTER WOJCIECHOWSKI

Dated: 6-02-2020

Respectfully submitted,

Dated: June 2, 2020

**MICROBILT CORPORATION**

By Counsel



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**CERTIFICATE OF SERVICE BY EMAIL**

I hereby certify that on the 2nd day of June, 2020, I emailed the foregoing to:

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